

DEPARTMENT OF PUBLIC SERVICE REGULATION
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MONTANA

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INQUIRY INTO MATTERS)	UTILITY DIVISION
CONCERNING INTERCARRIER)	
COMPENSATION)	DOCKET NO. D2004.5.84

November 17, 2006 Workshop
Comments of the Supporters of the Missoula Plan

The Supports of the Missoula Plan¹ (Supporters) commend the Montana Public Service Commission (MTPSC) for convening this workshop to obtain input with respect to the Missoula Plan (Plan) for intercarrier compensation reform. This Plan is the result of years of industry collaboration and negotiation, and is supported by a diverse group of carriers, representing virtually the entire spectrum of the telecommunications industry, including BOCs, CLECs, IXC, mid-sized ILECs, CMRS carriers, and rural ILECs. The Plan resolves a vast array of issues that have plagued carriers for decades in their efforts to interconnect with one another, pay each other for the use of their networks to originate or terminate traffic, and provide universal service to their customers. It comprehensively addresses the myriad interrelationships among and between intercarrier payments, network interconnection, and certain components of universal service that make up the current system of “intercarrier compensation.”

To facilitate discussion at the workshop, the MTPSC seeks input from interested parties in four areas:

1. General comments on the “Missoula Plan” and other plans that will be or that were filed with the FCC;

¹ The Supporters of the Missoula Plan include AT&T, Inc., BellSouth Corporation, Cingular Wireless, LLC, Commonwealth Telephone Company, Consolidated Communications, Embarq Corporation, Epic Touch Company, Global Crossings North America, Inc., Iowa Telecommunications Services, Inc., Level 3 Communications, LLC, Madison River Communications Corporation, The Rural Alliance and Windstream Corporation.

2. Specific comments on issues raised in the “Missoula Plan,” including legal issues (preemption, jurisdiction), rates (origination and termination charges, meet point) and rate impacts on rural and urban customers and carriers; and any other issues on specific substantive parts of the proposals (e.g., competitive neutrality, net neutrality, phantom traffic);
3. Specific comments on how the “Missoula Plan” may cause changes in federal universal service funding and mechanisms for rural and non-rural carriers;
4. Recommendations regarding reply comments that the MTPSC might file with the FCC and implementation of intercarrier compensation reform at the state level.

In response to this request, the Supporters attach two documents. The first document is the comments filed by the Supporters with the Federal Communications Commission (FCC) on October 25, 2006 in response to Public Notice (DA 06-1730) released in CC Docket 01-92 on August 29, 2006. This document provides information on the Plan responsive to questions one through three, above. In addition, the Supporters are also attaching a PowerPoint presentation describing the Missoula Plan, and explaining why we believe its adoption to be in the public interest. If the MTPSC believes that beginning the workshop with this or a similar presentation highlighting the key elements of the Plan would allow all participants to begin the workshop with a common basis of understanding, our representatives at the Workshop would be pleased to do so. In response to the fourth question above, the Supporters would respectfully recommend that the MTPSC file reply comments in the FCC’s Notice proceeding supporting the Missoula Plan as a comprehensive framework for the solution to multiple intercarrier compensation issues that will serve to benefit consumers in the state of Montana.

Should you have any questions regarding this material or the Supporters’ participation in the Workshop, please feel free to contact the undersigned. The Supporters again would like to thank the MTPSC for convening this Workshop, and we look forward to a stimulating and productive discussion.

(filed electronically)

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